

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

**BIANCA CLAYBORNE,**  
**Individually**  
**And as next friend of J.C., D.W.,**  
**L.W., A.C., and P.C.,**

**Plaintiffs,**

**Vs.**

**RUBEN BASALDUA *et al.*,**

**Defendants.**

**CASE NO. 4:24-CV-00012**

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**ANSWER TO THE AMENDED COMPLAINT BY KATLYN TAYLOR**

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Defendant Katlyn Taylor (née Pelham), states the following for their Answer to Plaintiffs' Amended Complaint:

1. Paragraph 1 is denied.
2. Paragraph 2 is denied as it relates to any actions taken by Ms. Taylor in her role as a DCS Case Manager. She is without sufficient knowledge to admit or deny the remaining allegations in Paragraph 2.
3. Admitted upon information and belief that Bianca Clayborne is the mother of five children. It is denied, upon information and belief, that Deonte Williams is the father of all children present. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations in Paragraph 3.
4. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 4.

5. Paragraph 5 is admitted to the extent that Ms. Taylor was informed that Ms. Clayborne was not being arrested, and Trooper Clark stated that she was a “good mother.” The remaining allegations of paragraph 5 are denied.
6. Paragraph 6 is denied.
7. Paragraph 7 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the remaining allegations in Paragraph 7.
8. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 8.
9. Paragraph 9 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the remaining allegations in Paragraph 9.
10. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 10.
11. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 11.
12. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 12.
13. Paragraph 13 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the remaining allegations in Paragraph 13.

14. Paragraph 14 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the allegations in Paragraph 14.
15. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 15.
16. Paragraph 16 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the allegations in Paragraph 16.
17. Paragraph 17 is admitted to the extent that the children were separated from their mother for 55 days. The remaining allegations in paragraph 17 are denied.
18. Paragraph 18 is admitted to the extent that the children were initially separated from each other and placed in foster homes. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 18.
19. Paragraph 19 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the allegations in Paragraph 19.
20. Paragraph 20 is denied to the extent that these allegations pertain to any actions taken by Ms. Taylor. She is without sufficient knowledge to admit or deny the allegations in Paragraph 20.
21. Upon information and belief, Paragraph 21 is admitted
22. Upon information and belief, Paragraph 22 is admitted

23. Upon information and belief, it is denied that Deonte Williams is the father of all five children, as alleged in paragraph 23. The remaining allegations in paragraph 23 are admitted upon information and belief.
24. Upon information and belief, Paragraph 24 is admitted
25. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 25.
26. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 26.
27. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 27.
28. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 28.
29. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 29.
30. Paragraph 30 is admitted.
31. Paragraph 31 is admitted.
32. Paragraph 32 is admitted.
33. Paragraph 33 is admitted.
34. Paragraph 34 is admitted.
35. Paragraph 35 is admitted.
36. Paragraph 36 is admitted.
37. Upon information and belief, Paragraph 37 is admitted.
38. Upon information and belief, Paragraph 38 is admitted

39. Upon information and belief, Paragraph 39 is admitted.
40. Upon information and belief, Paragraph 40 is admitted.
41. Upon information and belief, Paragraph 41 is admitted
42. Upon information and belief, Paragraph 42 is admitted.
43. Upon information and belief, Paragraph 43 is admitted
44. Paragraph 44 contains no allegations, and thus, no response is required.
45. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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46. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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54. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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55. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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56. Paragraph 56 contains no allegations, and thus, no response is required.

57. Paragraph 57 is admitted to the extent that jurisdiction is proper in this Court. Any  
allegation that Plaintiffs are entitled to any relief under any legal theory is denied.

58. Paragraph 58 is admitted to the extent that the venue is proper. Any allegation that Plaintiffs  
are entitled to any relief under any legal theory is denied.

59. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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60. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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65. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 65.

66. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 66.

67. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 67.

68. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 68.

69. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 69.

70. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 70.

71. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 71.

72. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 72.

73. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 73.

74. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 74.

75. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 75.

76. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph  
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87. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 87.

88. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 88.

89. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 89.

90. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 90.

91. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 91.

92. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 92.

93. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 93.

94. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 94.

95. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 95.

96. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 96.

97. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 97.

98. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 98.

99. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 99.

100. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 100.

101. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 101.

102. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 102.

103. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 103.

104. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 104.

105. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 105.

106. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 106.

107. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 107.

108. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 108.

109. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 109.
110. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 110.
111. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 111.
112. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 112.
113. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 113.
114. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 114.
115. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 115.
116. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 116.
117. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 117.
118. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 118.
119. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 119.

120. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 120.
121. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 121.
122. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 122.
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124. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 124.
125. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 125.
126. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 126.
127. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 127.
128. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 128.
129. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 129.
130. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 130.

131. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 131.
132. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 132.
133. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 133.
134. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 134.
135. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 135.
136. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 136.
137. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 137.
138. Upon information and belief, Paragraph 138 is admitted.
139. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 139.
140. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 140.
141. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 141.
142. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 142.

143. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 143.

144. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 144.

145. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 145.

146. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 146.

147. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 147.

148. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 148.

149. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 149.

150. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 150.

151. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 151.

152. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 152.

153. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 153.

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156. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 156.

157. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 157.

158. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 158.

159. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 159.

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161. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 161.

162. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 162.

163. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 163.

164. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 164.

165. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 165.

166. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 166.

167. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 167.

168. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 168.

169. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 169.

170. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 170.

171. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 171.

172. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 172.

173. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 173.

174. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 174.

175. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 175.

176. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 176.

177. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 177.

178. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 178.

179. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 179.

180. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 180.

181. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 181.

182. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 182.

183. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 183.

184. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 184.

185. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 185.

186. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 186.

187. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 187.

188. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 188.

189. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 189.

190. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 190.

191. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 191.

192. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 192.

193. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 193.

194. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 194.

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198. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 198.

199. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 199.

200. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 200.

201. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 201.

202. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 202.

203. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 203.

204. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 204.

205. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 205.

206. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 206.

207. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 207.

208. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 208.

209. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 209.

210. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 210.

211. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 211.

212. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 212

213. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 213.

214. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 214.

215. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 215.

216. Paragraph 216 is admitted.

217. Paragraph 217 is admitted.

218. Paragraph 218 is admitted.

219. Paragraph 219 is admitted.

220. Paragraph 220 is admitted.

221. Paragraph 221 is admitted.

222. Paragraph 222 is admitted.

223. Paragraph 223 is admitted.

224. Paragraph 224 is admitted.

225. Paragraph 225 is admitted to the extent that Ms. Taylor still needed to Ms. Clayborne regarding the allegations made.
226. Paragraph 226 is admitted to the extent that Trooper Clark told Taylor and another DCS employee that “the kids are fine, as far as being cared for.” The remainder of paragraph 105 is denied.
227. Paragraph 227 is admitted.
228. Paragraph 228 is admitted to the extent that Ms. Taylor talked to Ms. Clayborne following the conversation with Trooper Clark. The remaining allegations in paragraph 228 are denied.
229. Paragraph 229 is admitted.
230. Paragraph 230 is admitted.
231. Paragraph 231 is admitted.
232. Paragraph 232 is admitted.
233. Paragraph 233 is admitted.
234. Paragraph 234 is admitted to the extent that Ms. Taylor, Ms. Wright-Gilliam, and Ms. Velez spoke with Montana Medina. The remaining allegations of Paragraph 234 are denied.
235. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 235.
236. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 236.
237. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 237.

238. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 238.

239. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 239.

240. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 240.

241. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 241.

242. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 242.

243. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 243.

244. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 244.

245. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 245.

246. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 246.

247. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 247.

248. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 248.

249. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 249.

250. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 250.

251. Paragraph 251 is a legal conclusion that requires no response. Paragraph 251 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

252. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 252.

253. It is admitted that Ms. Taylor approached the Clayborne vehicle. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations in Paragraph

254. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 254.

255. Paragraph 255 is admitted.

256. Paragraph 256 is admitted to the extent that Ms. Taylor spoke to Ms. Clayborne in her vehicle. The remaining allegations in Paragraph 256 are denied.

257. Paragraph 257 is admitted to the extent that Ms. Taylor spoke to Ms. Clayborne in her vehicle. Ms. Taylor is without sufficient knowledge to admit or deny any allegations about the actions of Troopers Foster, Taylor, and Thompson. The remaining allegations in Paragraph 257 are denied.

258. Paragraph 258 is admitted to the extent that Ms. Taylor spoke with Troopers Clark and Thompson. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 258.

259. Paragraph 259 is admitted to the extent that the Troopers left the Coffee County Jail. Ms. Taylor is without sufficient knowledge to admit or deny any allegations about any further actions of Troopers Foster, Taylor, and Thompson. The remaining allegations in Paragraph 259 are denied.
260. Ms. Taylor is without sufficient knowledge to admit or deny the allegations in Paragraph 260 pertaining to the actions of the Tennessee Highway Patrol. It is admitted that Ms. Clayborne remained at the Coffee County Jail to speak with DCS. The remaining allegations of Paragraph 260 are denied.
261. Paragraph 261 is admitted to the extent that Ms. Taylor, Ms. Wright-Gilliam, and Ms. Velez remained at the scene to speak with Ms. Clayborne and investigate the allegations made. The remaining allegations of Paragraph 261 are denied.
262. Paragraph 262 is admitted to the extent that the DCS employees at the scene spoke with Ms. Medina. It is denied that Ms. Taylor spoke with Mr. Lynn.
263. Paragraph 263 is denied.
264. Paragraph 264 is denied.
265. Paragraph 265 is denied.
266. Paragraph 266 is denied.
267. Paragraph 267 is denied.
268. Paragraph 268 is denied. It is further denied that Ms. Taylor forced Ms. Clayborne to answer any questions after Ms. Clayborne stated she no longer wished to speak with her.
269. Paragraph 269 is denied.

270. Paragraph 270 is admitted to the extent that Ms. Taylor and other DCS employees on the scene talked with Ms. Medina about the situation. The remaining allegations in Paragraph 270 are denied.
271. Paragraph 271 is admitted to the extent that DCS worked and asked Clayborne to take a drug screen in the women's restroom in the jail. The remaining allegations in Paragraph 271 are denied.
272. Paragraph 272 is admitted.
273. Paragraph 273 is denied.
274. Paragraph 274 is admitted to the extent that Clayborne attempted to take the drug screen in the front seat of the vehicle, which required her to pull down her pants and underwear, and that Ms. Taylor was also in the vehicle. The remaining allegations of Paragraph 274 are denied.
275. Paragraph 275 is admitted to the extent that the Clayborne children were moving around. The remaining allegations of Paragraph 275 are denied.
276. Paragraph 276 is admitted to the extent that Clayborne was unable to provide a urine sample. The remaining allegations of Paragraph 276 are denied.
277. Paragraph 277 is denied.
278. Paragraph 278 is denied.
279. Paragraph 279 is denied. It is also specifically denied that Ms. Clayborne was demanded to take the drug screening.
280. Paragraph 280 is admitted to the extent that DCS workers continued to speak with Ms. Clayborne. The remaining allegations in Paragraph 280 are denied.
281. Paragraph 281 is admitted.

282. Ms. Taylor is without sufficient knowledge to admit or deny whether Ms. Clayborne asked why having relatives in Tennessee would matter. The remaining allegations of Paragraph 282 are denied.

283. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 283.

284. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 284.

285. Paragraph 285 is admitted to the extent that Ms. Taylor was given a citation. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 285.

286. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 286.

287. Paragraph 287 is admitted to the extent that DCS employees informed Ms. Clayborne that her children were being removed, and she appeared to be upset. The remaining allegations of Paragraph 287 are denied.

288. Paragraph 288 is admitted.

289. Paragraph 289 is admitted to the extent that hat Clayborne locked the doors to her vehicle and remained in the parking lot. The DCS Defendants are without sufficient knowledge to admit or deny the remaining allegations in paragraph 289.

290. Paragraph 290 is denied to the extent it alleges DCS forced Ms. Clayborne to speak with them, and strict proof thereof is demanded. DCS exited the vehicle after Plaintiff admitted to smoking marijuana while breastfeeding and Plaintiff exercised her First Amendment Right by telling DCS to get out of her car.

291. Paragraph 291 is denied.

292. Paragraph 292 is admitted to the extent that the Clayborne children were removed.

The remaining allegations of Paragraph 292 are denied.

293. Paragraph 293 is denied,

294. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 294.

295. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 295.

296. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 296.

297. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 297.

298. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 298.

299. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 299.

300. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 300.

301. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 301.

302. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 302.

303. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 303.

304. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 304.

305. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 305.

306. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 306.

307. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 307.

308. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 308.

309. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 309.

310. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 310.

311. Paragraph 311 is denied to the extent it alleges that DCS detained Ms. Clayborne and her children at the jail. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 311.

312. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 312.

313. Paragraph 313 is denied.

314. Paragraph 314 is denied.

315. Paragraph 315 calls for a legal conclusion. Tennessee law speaks for itself.

Paragraph 315 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

316. Paragraph 316 is denied.

317. Paragraph 317 is denied as stated.

318. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 318.

319. Paragraph 319 is admitted.

320. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 320.

321. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 321.

322. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 322.

323. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 323.

324. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 324.

325. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 325.

326. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 326.

327. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 327.

328. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 328.

329. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 329.

330. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 330.

331. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 331.

332. Paragraph 332 is denied.

333. Paragraph 333 is denied.

334. Paragraph 334 is denied.

335. Paragraph 335 is denied.

336. Paragraph 336 is denied as stated.

337. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 337.

338. Paragraph 338 is denied.

339. Paragraph 339 is denied.

340. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 340.

341. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 341.

342. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 342.

343. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 343.

344. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 344.

345. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 345.

346. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 346.

347. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 347.

348. Paragraph 348 does not contain an allegation, and thus requires no response. Paragraph 348 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

349. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 349.

350. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 350.

351. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 351.

352. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 352.

353. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 353.

354. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 354.

355. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 355.

356. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 356.

357. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 357.

358. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 358.

359. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 359.

360. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 360.

361. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 361.

362. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 362.

363. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 363.

364. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 364.

365. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 365.

366. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 366.

367. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 367.

368. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 368.

369. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 369.

370. Paragraph 370 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 370 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

371. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 371.

372. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 372.

373. Paragraph 373 is admitted to the extent that Coffee County Officers assisted in the removal of the Clayborne children. The remaining allegations in Paragraph 373 are denied.

374. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 374.

375. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 375.

376. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 376.

377. Paragraph 377 is denied to the extent that Ms. Taylor did not instruct Ms. Clayborne to sit on the bench with her children. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 377.

378. Paragraph 378 is denied.

379. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 379.

380. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 380.

381. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 381.

382. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 382.

383. Paragraph 383 is denied to the extent that it is alleged that Ms. Taylor detained Ms. Clayborne inside the jail. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 383.

384. Paragraph 384 is admitted to the extent that Coffee County officers assisted in the removal of the Clayborne children. The remaining allegations in Paragraph 384 are denied.

385. Paragraph 385 is admitted to the extent that Coffee County officers assisted in the removal of the Clayborne children. The remaining allegations in Paragraph 385 are denied.

386. Paragraph 386 is admitted to the extent that the children were removed from Clayborne's custody. the remaining allegations in Paragraph 386 are denied.
387. Paragraph 387 is admitted to the extent that the children were removed from Clayborne's custody. the remaining allegations in Paragraph 387 are denied.
388. Paragraph 388 is denied.
389. Paragraph 389 is denied.
390. Paragraph 390 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 390 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.
391. Paragraph 391 is denied.
392. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 392.
393. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 393.
394. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 394.
395. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 395.
396. Paragraph 396 is denied.
397. Paragraph 397 is admitted.
398. Paragraph 398 is denied.
399. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 399.

400. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 400.

401. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 401.

402. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 402.

403. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 403.

404. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 404.

405. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 405.

406. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 406.

407. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 407.

408. Paragraph 408 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 408 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

409. Paragraph 409 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 409 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

410. Paragraph 410 is denied.

411. Paragraph 411 is denied.

412. Paragraph 412 is denied.

413. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 413.

414. Paragraph 414 is denied to the extent that any allegations relate to any actions taken by Ms. Taylor. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 414.

415. Paragraph 415 is denied to the extent that any allegations relate to any actions taken by Ms. Taylor. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 415.

416. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 416.

417. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 417.

418. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 418.

419. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 419.

420. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 420.

421. Paragraph 421 is denied to the extent that any allegations relate to any actions taken by Ms. Taylor. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 421.

422. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 422.

423. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 423.

424. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 424.

425. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 425.

426. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 426.

427. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 427.

428. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 428.

429. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 429.

430. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 430.

431. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 431.

432. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 432.

433. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 433.

434. Paragraph 434 is denied.

435. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 435.

436. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 436.

437. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 437.

438. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 438.

439. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 439.

440. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 440.

441. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 441.

442. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 442.

443. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 443.

444. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 444.

445. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 445.

446. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 446.

447. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 447.

448. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 448.

449. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 449.

450. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 450.

451. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 451.

452. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 452.

453. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 453.

454. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 454.

455. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 455.

456. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 456.

457. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 457.

458. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 458.

459. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 459.

460. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 460.

461. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 461.

462. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 462.

463. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 463.

464. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 464.

465. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 465.

466. Paragraph 466 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 466 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

467. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 467.

468. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 468.

469. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 469.

470. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 470.

471. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 471.

472. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 472.

473. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 473.

474. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 474.

475. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 475.

476. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 476.

477. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 477.

478. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 478.

479. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 479.

480. Paragraph 480 is admitted.

481. Paragraph 481 is admitted.

482. Paragraph 482 is admitted.

483. Paragraph 483 is admitted to the extent that the original copy of the file no longer exists. However, the information from the file was uploaded into the DCS filing system.

484. Paragraph 484 is admitted.

485. Paragraph 485 is admitted to the extent that the original copy of the file no longer exists. However, the information from the file was uploaded into the DCS filing system.

486. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 486.

487. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 487.

488. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 488.

489. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 489.

490. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 490.

491. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 491.

492. Paragraph 492 is denied.

493. Paragraph 493 is admitted to the extent that the Clayborne children remained in DCS custody for 55 days. However, the remaining allegations of Paragraph 493 are denied.

494. Paragraph 494 is admitted to the extent that the *Petition for Temporary Legal Custody and Ex Parte Order* were filed on February 21, 2023. The remaining allegations of Paragraph 494 are denied.

495. Paragraph 495 is admitted to the extent that this was the first petition filed. The remaining allegations in Paragraph 495 are denied.

496. Paragraph 496 is admitted.

497. Paragraph 497 is admitted to the extent that Ms. Taylor signed and verified the petition to be true to the best of her knowledge, information, and belief. The remaining allegations in Paragraph 497 are denied.

498. Paragraph 498 is admitted to the extent that, when the petition was filed, the children had already been removed from Clayborne's custody on February 17, 2023. The remaining allegations of 498 are denied.

499. Paragraph 499 is denied.

500. Paragraph 500 is admitted.

501. Paragraph 501 is denied.

502. Paragraph 502 is denied.

503. Paragraph 503 is admitted to the extent that Ms. Taylor and Ms. Younglove discussed the Clayborne matter. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 503.
504. Paragraph 504 is admitted to the extent that Ms. Taylor assisted in drafting the petition. The remaining allegations in Paragraph 504 are denied.
505. Paragraph 505 is denied to the extent that Ms. Taylor forced Ms. Clayborne to answer questions or take the drug screen. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 505.
506. Paragraph 506 is admitted to the extent that it is cited in the petition that Ms. Clayborne failed to take the drug screen, and locked herself in the vehicle. The remaining allegations in Paragraph 506 are denied.
507. Paragraph 507 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 507 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.
508. Paragraph 508 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 508 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.
509. Paragraph 509 is denied.
510. Paragraph 510 is admitted to the extent that the Petition cites T.C.A. § 37-1-102(b)(13) and T.C.A. § 37-1-102(b)(147). The remaining allegations in Paragraph 510 are denied.
511. Paragraph 511 is admitted.
512. Paragraph 512 is admitted.

513. Paragraph 513 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 513 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

514. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 514.

515. Paragraph 515 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 515 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

516. Paragraph 516 is admitted to the extent that the preliminary hearing was set for February 23, 2023. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 516.

517. Paragraph 517 is admitted.

518. Paragraph 518 is denied.

519. Paragraph 519 is denied.

520. Paragraph 520 is denied.

521. Paragraph 521 is admitted.

522. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 522.

523. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 523.

524. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 524.

525. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 525.

526. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 526.

527. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 527.

528. Paragraph 528 is admitted.

529. Paragraph 529 is admitted to the extent that Ms. Taylor attended the preliminary hearing. The remaining allegations in Paragraph 529 are denied.

530. Paragraph 529 is admitted to the extent that Ms. Taylor attended the preliminary hearing. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 530.

531. Paragraph 531 is admitted to the extent that Ms. Taylor did not testify. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 531.

532. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 532.

533. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 533.

534. Paragraph 534 is admitted.

535. Paragraph 535 is admitted.

536. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 536.

537. Paragraph 537 is denied.

538. Paragraph 538 is denied.

539. Paragraph 539 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 539 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

540. Paragraph 540 is admitted to the extent that the children were not returned to Ms. Clayborne's custody. The remaining allegations of Paragraph 540 are denied.

541. Paragraph 541 is admitted.

542. Paragraph 542 is admitted.

543. Paragraph 543 is denied.

544. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 544.

545. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 545.

546. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 546.

547. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 547.

548. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 548.

549. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 549.

550. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 550.

551. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 551.

552. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 552.

553. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 553.

554. Paragraph 554 is admitted.

555. Paragraph 555 is admitted to the extent that the 4 month-old child was breastfeeding. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 555.

556. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 556.

557. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 557.

558. Paragraph 558 is admitted to the extent that, upon information and belief, the children were placed in more than one foster home. The remaining allegations in Paragraph 558 are denied.

559. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 559.

560. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 560.

561. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 561.

562. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 562.

563. Paragraph 563 is admitted to the extent that March 3, 2023, was 14 days after the children's removal. The remaining allegations in Paragraph 563 are denied.

564. Paragraph 564 is admitted.

565. Paragraph 565 is admitted.

566. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 566.

567. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 567.

568. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 568.

569. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 569.

570. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 570.

571. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 571.

572. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 572.

573. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 573.

574. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 574.

575. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 575.

576. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 576.

577. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 577.

578. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 578.

579. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 579.

580. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 580.

581. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 581.

582. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 582.

583. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 583.

584. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 584.

585. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 585.

586. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 586.

587. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 587.

588. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 588.

589. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 589.

590. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 590.

591. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 591.

592. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 592.

593. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 593.

594. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 594.

595. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 595.

596. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 596.

597. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 597.

598. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 598.

599. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 599.

600. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 600.

601. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 601.

602. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 602.

603. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 603.

604. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 604.

605. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 605.

606. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 606.

607. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 607.

608. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 608.

609. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 609.

610. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 610.

611. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 611.

612. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 612.

613. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 613.

614. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 614.

615. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 615.

616. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 616.

617. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 617.

618. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 618.

619. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 619.

620. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 620.

621. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 621.

622. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 622.

623. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 623.

624. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 624.

625. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 625.

626. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 626.

627. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 627.

628. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 628.

629. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 629.

630-648 Count I is not alleged against Ms. Taylor, and thus, no response is required. To the extent, if any, that the allegations in paragraphs 630–648 attempt to establish any liability on the part of Ms. Taylor, they are denied.

649-663. Count II is not alleged against Ms. Taylor, and thus, no response is required. To the extent, if any, that the allegations in paragraphs 649–663 attempt to establish any liability on the part of Ms. Taylor, they are denied.

664. Paragraph 664 contains no allegations and thus does not warrant a response.

665. Paragraph 665 calls for a legal conclusion. The law speaks for itself. Paragraph 665 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

666. Paragraph 666 is admitted upon information and belief to the extent that Clayborne was cited for simple possession of marijuana on February 17, 2023. Ms. Taylor is without sufficient knowledge to admit or deny the precise amount of marijuana found in her possession.

667. Paragraph 667 is admitted upon information and belief.

668. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 668.

669. Paragraph 669 is denied.

670. Paragraph 670 is denied. It is further denied that Ms. Taylor detained the Clayborne family at any point.

671. Paragraph 671 is denied.

672. Paragraph 672 is denied.

673. Paragraph 673 is admitted to the extent that Ms. Taylor, Ms. Wright-Gilliam, and Ms. Velez were present at the Coffee County Jail on February 17, 2023. The remaining allegations of Paragraph 673 are denied.

674. Paragraph 674 is denied.

675. Paragraph 675 is denied.

676. Paragraph 676 is denied.

677. Paragraph 677 is denied. The Clayborne family was not seized or placed under arrest by DCS or Ms. Taylor.

678. Paragraph 678 is denied. The Clayborne family was not placed under arrest by DCS or Ms. Taylor.

679. Paragraph 679 is admitted to the extent that Ms. Medine notified Ms. Taylor and Ms. Wright-Gilliam, that the children were being removed. The remaining allegations of Paragraph 679 are denied.

680. Paragraph 680 is admitted to the extent that spike strips were placed behind the Clayborne vehicle. The remaining allegations of Paragraph 680 are denied.

681. Paragraph 681 is denied.

682. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 682.

683. Paragraph 683 is denied.

684. Paragraph 684 is denied.

685. Paragraph 685 is denied.

686. Paragraph 686 is denied. Ms. Clayborne was never seized by Ms. Taylor or DCS Defendants.

687. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 687.

688. Paragraph 688 is denied.

689. Paragraph 689 is denied.

690. Paragraph 690 contains no allegations and thus does not warrant a response.

691. Paragraph 691 calls for a legal conclusion. The law speaks for itself. Paragraph 691 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

692. Paragraph 692 is denied.

693. Paragraph 693 is admitted to the extent that the children were removed prior to a petition being filed, or a hearing being held. The remaining allegations in Paragraph 693 are denied.

694. Paragraph 694 is denied.

695. Paragraph 695 is denied.

696. Paragraph 696 is denied.

697. Paragraph 697 is denied.

698. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 698.

699. Paragraph 699 is admitted to the extent that Coffee County officers assisted in the removal of the Clayborne children. The remaining allegations of Paragraph 699 are denied.

700. Paragraph 700 is denied.

701. Paragraph 701 is denied.

702. Paragraph 702 is denied.

703. Paragraph 703 is denied.

704. Paragraph 704 contains no allegations and thus does not warrant a response.
705. Paragraph 705 calls for a legal conclusion. Tennessee law speaks for itself. Paragraph 705 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.
706. Paragraph 706 is denied.
707. Upon information and belief, Paragraph 706 is admitted to the extent that Ms. Clayborne was cited for simple possession of marijuana. Ms. Taylor is without sufficient knowledge to admit or deny the remaining allegations of Paragraph 707.
708. Upon information and belief, Paragraph 707 is admitted.
709. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 709.
710. Paragraph 710 is denied.
711. Paragraph 711 is denied. Ms. Taylor did not detain the Clayborne family.
712. Paragraph 712 is denied.
713. Paragraph 713 is admitted to the extent that Ms. Taylor spoke to Ms. Clayborne in her vehicle. The remaining allegations in Paragraph 713 is denied.
714. Paragraph 714 is denied.
715. Paragraph 715 is denied.
716. Paragraph 716 is denied.
717. Paragraph 717 is denied. Ms. Taylor did not seize the Clayborne family.
718. Paragraph 718 is denied. Ms. Taylor did not seize the Clayborne family.
719. Paragraph 719 is admitted to the extent that spike strips were placed behind the Clayborne car. The remaining allegations of Paragraph 719 are denied.

720. Paragraph 720 is denied.
721. Paragraph 721 is denied.
722. Paragraph 722 is denied.
723. Paragraph 723 is denied.
724. Paragraph 724 is denied.
725. Paragraph 725 is denied.
726. Paragraph 726 is denied.
727. Paragraph 727 is denied.
728. Paragraph 728 contains no allegations and thus does not warrant a response.
729. Paragraph 729 calls for a legal conclusion. The law speaks for itself. Paragraph 729 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.
730. Paragraph 730 is denied.
731. Paragraph 731 is denied.
732. Paragraph 732 is denied.
733. Paragraph 733 is denied.
734. Paragraph 734 is denied. Ms. Taylor did not conduct a search of Ms. Clayborne.
735. Paragraph 735 is denied. Ms. Taylor did not conduct a search of Ms. Clayborne.
736. Paragraph 736 is denied.
737. Paragraph 737 is denied.
738. Paragraph 738 is denied.
739. Paragraph 739 contains no allegations and thus does not warrant a response.
740. Paragraph 740 calls for a legal conclusion. The law speaks for itself. Paragraph 740 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

741. Paragraph 741 is denied.

742. Ms. Taylor is without sufficient knowledge to admit or deny the allegations of Paragraph 742.

743. Paragraph 743 is denied.

744. Paragraph 744 is denied.

745. Paragraph 745 is denied.

746. Paragraph 746 is denied.

747. Paragraph 747 is denied.

748. Paragraph 748 is denied.

749-761 Count VII is not alleged against Ms. Taylor, and thus, no response is required. To the extent, if any, that the allegations in paragraphs 630–648 attempt to establish any liability on the part of Ms. Taylor, they are denied.

762. Paragraph 762 contains no allegations and thus does not warrant a response.

763. Paragraph 763 calls for a legal conclusion. The law speaks for itself. Paragraph 763 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

764. Paragraph 764 calls for a legal conclusion. The law speaks for itself. Paragraph 764 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

765. Paragraph 765 calls for a legal conclusion. The law speaks for itself. Paragraph 765 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

766. Paragraph 766 calls for a legal conclusion. The law speaks for itself. Paragraph 766 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

767. Paragraph 767 calls for a legal conclusion. The law speaks for itself. Paragraph 767 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

768. Paragraph 768 calls for a legal conclusion. The law speaks for itself. Paragraph 768 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

769. Paragraph 769 calls for a legal conclusion. The law speaks for itself. Paragraph 769 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

770. Paragraph 770 is denied.

771. Paragraph 771 is admitted to the extent that a petition was not filed or a hearing held before the removal of the Clayborne children. The remaining allegations of Paragraph 771 are denied.

772. Paragraph 772 is denied.

773. Paragraph 773 is admitted to the extent that the children were removed before the petition was filed or a written order executed. The remaining allegations of Paragraph 773 are denied.

774. Paragraph 774 is denied.

775. Paragraph 775 is denied.

776. Paragraph 776 is denied.

777. Paragraph 777 is admitted to the extent that Trooper Clark made statements to Ms. Taylor that he considered Clayborne a good mother after THP made a P1 referral of child abuse to DCS. The remaining allegations of Paragraph 777 are denied.

778. Paragraph 778 is denied.

779. Paragraph 779 is denied.

780. Paragraph 780 is denied.

781. Paragraph 781 is denied.

782. Paragraph 782 is denied.

783. Paragraph 783 contains no allegations and thus does not warrant a response.

784. Paragraph 784 calls for a legal conclusion. The law speaks for itself. Paragraph 784 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

785. Paragraph 785 calls for a legal conclusion. The law speaks for itself. Paragraph 785 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

786. Paragraph 786 is denied.

787. Paragraph 787 calls for a legal conclusion. The law speaks for itself. Paragraph 787 is denied to the extent that it attempts to establish any liability on the part of Ms. Taylor.

788. Paragraph 788 is denied. Paragraph 788 is denied.

789. Paragraph 789 is denied.

790. Paragraph 790 is denied.

791. Paragraph 791 is denied.

792. Paragraph 792 is denied.

793. Paragraph 793 is denied.

794. Ms. Taylor denies any allegations in the Plaintiffs' "Relief Requested" and denies that the Plaintiffs are entitled to any relief under any theory whatsoever.

795. Ms. Taylor denies any allegations not specifically admitted and demands strict proof thereof. Ms. Taylor reserves her right to amend her Answer should further evidence be discovered throughout this lawsuit.

### **AFFIRMATIVE DEFENSES**

WHEREFORE, having fully answered the allegations of the Complaint, Ms. Taylor raises the following affirmative defenses:

1. The Complaint must be dismissed because it fails to state a claim upon which relief may be granted.
2. The Complaint must be dismissed because Ms. Taylor is entitled to qualified immunity.

**RELIEF REQUESTED**

1. This Court dismiss all claims against Ms. Taylor.
2. Ms. Taylor's attorneys' fees and costs.
3. Pursuant to Fed. R. Civ. P. Rule 38, Ms. Taylor demands a jury trial.

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### CERTIFICATE OF SERVICE

I hereby certify that I will electronically file the foregoing with the Clerk of the Court using CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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This the 20<sup>th</sup> day of March, 2025.

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